

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

EDITH PALOS,

Plaintiff

v.

UNIVERSITY OF TEXAS
HEALTH SCIENCE CENTER
HOUSTON,

Defendant

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CA: 4:09-CV-02798

TRIAL BY JURY DEMANDED

**OPPOSED MOTION OF LARRY WATTS TO RESET THE HEARING ON
LARRY WATTS' MOTION TO WITHDRAW AS COUNSEL FOR
PLAINTIFF, EDITH PALOS**

COMES NOW Larry Watts ("Movant") and makes this his opposed motion to reset the hearing on his motion to withdraw as counsel for Plaintiff, Edith Palos; and by way hereof, Movant would show the following:

1. Plaintiff is Edith Palos; Defendant is the University of Texas Health Science Center Houston.
2. Plaintiff sued Defendant for discriminatory employment practices in violation of the law.
3. On August 31, 2010, Plaintiff discharged her attorney, Movant Larry Watts. Movant agreed to withdraw as Plaintiff's counsel.
4. On September 4, 2010, Movant filed his Motion to Withdraw as Counsel for Plaintiff, Edith Palos ("Motion to Withdraw").

5. On September 8, 2010, the Court filed an Order denying Movant's Motion to Withdraw "at this time," and setting a hearing on Movant's Motion to Withdraw for September 22, 2010 at 8:30 a.m.

6. Movant is unable to attend a hearing on September 22, 2010. Movant has previously arranged plans to be out of state visiting family members from September 17, 2010 through September 25, 2010.

7. Movant will be filing an amended motion to withdraw as counsel to conform with the policy of the Honorable Kenneth Hoyt, as stated in the Court's September 8, 2010 Order Setting Hearing.

8. This motion is made not for delay, but that justice be done.

9. WHEREFORE, Movant prays that the hearing on his Motion to Withdraw be reset until after September 25, 2010. To expedite the selection of a new date for the hearing and avoid further scheduling conflicts, Movant would inform the Court that he is scheduled for oral argument before the 5th Circuit on October 5, 2010, oral submission before the Supreme Court of Texas on October 14, 2010, and has a hearing in Houston, Texas at 11:00 a.m. on September 27, 2010 in the 151st District Court.

Respectfully Submitted,

WATTS & ASSOCIATES

/S/ LW
Larry Watts
Texas Bar No. 20981000; FID 7092
P.O. Box 2214
Missouri City, Texas 77459
Telephone: (281) 431 1500
Facsimile: (281) 431 1298
E-mail: wattstrial@gmail.com

VERIFICATION

I, Larry Watts, hereby verify that the facts stated in this motion are true and correct within my personal knowledge upon penalty of perjury.

/S/LW
Larry Watts

CERTIFICATE OF CONFERENCE

I, Larry Watts, certify that I attempted to confer with opposing counsel, Darren Gibson, via e-mail on the 13th of September, 2010. At the time of the filing of this motion, I have not received a response from Mr. Gibson. I presume he opposes this motion.

/S/ LW
Larry Watts

CERTIFICATE OF SERVICE

I, Larry Watts, certify that a true and correct copy of this document has been served on opposing counsel on this the 13th of September, 2010 via electronic filing with the Clerk's CM/ECF system.

/S/ LW
Larry Watts